

## **EXHIBIT P**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PAVLE ZIVKOVIC, on behalf of himself and others  
similarly situated,

Plaintiff,

v.

LAURA CHRISTY LLC d/b/a VALBELLA,  
LAURA CHRISTY MIDTOWN LLC, DAVID  
GHATANFARD, and GENCO LUCA,

Defendants.

No. 17-cv-00553-GHW

**[PROPOSED] ORDER TO SHOW  
CAUSE WHY JUDGMENT DEBTOR  
DAVID GHATANFARD SHOULD  
NOT BE HELD IN CONTEMPT**

Upon the memorandum of law of Plaintiff Pavle Zivkovic, the declaration of Lucas C. Buzzard and the supporting documents attached thereto, and upon copies of an information subpoena issued to Defendant-Judgment-Debtor David Ghatanfard on August 1, 2022 and a subpoena duces tecum issued to Defendant-Judgment-Debtor David Ghatanfard on January 12, 2023, annexed thereto, it is

ORDERED that Defendant-Judgment-Debtor Ghatanfard shall file a written response to Plaintiff's application for an order to show cause of no more than \_\_\_\_ pages by no later than \_\_\_\_\_, 2023; Plaintiff shall file a reply thereto of no more than \_\_\_\_ pages by no later than \_\_\_\_\_, 2023; it is further

ORDERED that Defendant-Judgment-Debtor Ghatanfard shall show cause before the Honorable Gregory H. Woods, in Room 12C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan U.S. Courthouse at 500 Pearl Street, New York, NY, on \_\_\_\_\_, 2023, at \_\_\_\_\_, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Rule 69 of the Federal Rules of Civil

Procedure, Local Civil Rule 83.6, and N.Y. C.P.L.R. §§ 2308(a), 5224(a), and 5251 of the N.Y. C.P.L.R.:

1. Finding Ghatanfard guilty of civil contempt of court for willfully failed to comply with Plaintiffs' subpoena duces tecum dated January 12, 2023;
2. Finding Ghatanfard guilty of civil contempt of court for "false swearing" in response to written question posed in Plaintiffs' information subpoena dated August 1, 2022;
3. Ordering Ghatanfard to fully comply with the information subpoena and subpoena duces tecum within fourteen (14) days to purge his contempt;
4. Ordering Ghatanfard to pay a fine of \$\_\_\_\_ per day until he fully complies with the information subpoena and a subpoena duces tecum;
5. Ordering Ghatanfard to pay Plaintiff's counsel's attorney's fees and costs associated with bringing this application;
6. Ordering that if Ghatanfard fails to comply with the foregoing, Plaintiffs may move for any appropriate additional relief; and it is further

ORDERED that service a copy of this order and annexed affidavit, supporting documents, and papers upon Mr. Ghatanfard's counsel of record in this action via the Court's electronic filing system on or before \_\_\_\_\_, 2023 shall be deemed proper and sufficient service thereof.

Dated: New York, NY

\_\_\_\_\_, 2023

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Honorable Gregory H. Woods  
United States District Judge